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Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**FIFTH SUPPLEMENTAL DECLARATION
OF TOBIAS S. KELLER PURSUANT TO
11 U.S.C. § 327(a) AND FED. R. BANKR.
P. 2014(a) AND 2016 ON BEHALF OF
KELLER BENVENUTTI KIM LLP**

1 I, Tobias S. Keller, hereby declare pursuant 28 U.S.C. § 1746:

2 1. I am a partner of the firm of Keller Benvenuti Kim LLP (the “Firm”), a law firm with
3 offices at 650 California Street, Suite 1900, San Francisco, California 94108.

4 2. I submit this Declaration as a supplement to my declaration dated March 13, 2019
5 [Docket No. 870] (the “Original Declaration”) in support of the *Application of Debtors Pursuant to*
6 *11 U.S.C. §327(a) and Fed. R. Bankr. Proc. 2014(a) and 2016 for Authority to Retain and Employ*
7 *Keller & Benvenuti LLP as Co-Counsel for the Debtors Nunc Pro Tunc to the Petition Date*¹ [Docket
8 No. 869] (the “Retention Application”). On April 10, 2019, the Court entered the *Order Authorizing*
9 *Debtors Pursuant to 11 U.S.C. §327(a) and Fed. R. Bankr. Proc. 2014(a) and 2016 to Retain and*
10 *Employ Keller & Benvenuti LLP as Co-Counsel for the Debtors Nunc Pro Tunc to the Petition Date*
11 [Docket No. 1306].

12 3. The Firm has filed four previous supplemental disclosures to the Original Declaration
13 [Docket Nos. 2042, 2715, 4881 and 5224] regarding relationships and potential conflicts with other
14 parties in interest in these Chapter 11 Cases.

15 4. As anticipated in the Original Declaration, this declaration is submitted to supplement
16 information disclosed in the Original Declaration; as additional information regarding parties in
17 interest becomes available, further supplemental declarations will be submitted to the Court reflecting
18 such amended, supplemented or otherwise modified information.

19 5. Since the filing of the Original Declaration, additional developments in the Chapter 11
20 Cases require the supplemental disclosures set forth in the following paragraphs concerning a former
21 client of the Firm, Environmental Chemical Corporation (“**ECC**”).

22 6. Tuscan Ridge Associates, LLC (“**Tuscan Ridge**”) has asserted certain claims against
23 the Debtors alleging that PG&E failed to restore a defunct golf course on Tuscan Ridge property leased
24 or licensed to PG&E as a staging area for vegetation management and emergency response after the
25 2018 Camp Fire. ECC Constructors LLC (“**ECC Constructors**”), an affiliate of ECC, under a

26
27 ¹ Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms in
28 the Original Declaration.

1 separate contract with Tuscan Ridge, occupied that same area after PG&E left. There is a possibility
2 that PG&E could assert rights or claims against ECC Constructors or defenses to Tuscan Ridge's
3 claims arising from ECC Constructors' occupancy or activities.

4 7. The Firm has previously represented ECC on matters unrelated to these Chapter 11
5 Cases or Tuscan Ridge. The Firm has not performed services for ECC or its affiliates since November
6 2018.

7 8. As of this time, the Firm does not believe there is any potential conflict of interest, but
8 is making the disclosures in this declaration as a matter of prudence.

9 I declare under penalty of perjury that, to the best of my knowledge and after reasonable
10 inquiry, the foregoing is true and correct and that this declaration was executed at San Francisco,
11 California, on June 16, 2020.

12 /s/ Tobias S. Keller

13 Tobias S. Keller
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Notice Parties

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